

UNITED STATES DISTRICT COURT
for the
Northern District of Ohio

United States of America)
v.)
DAMON M. JOSEPH aka Abdullah Ali Yusuf) Case No. 3:18mj5413
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)
)
)
)

Defendant(s)

FILED

9:57 am Dec 10 2018

**Clerk U.S. District Court
Northern District of Ohio
Toledo**

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of Sept. 12, 2018 to Dec. 7, 2018 in the county of Lucas in the
Northern District of Ohio, the defendant(s) violated:

<i>Code Section</i>	<i>Offense Description</i>
18 U.S.C. 2339B(a)(1)	Attempting to Provide Material Support or Resources to Foreign Terrorist Organization

This criminal complaint is based on these facts:

See attached affidavit

Continued on the attached sheet.

/s/ J.T. Amundson

Complainant's signature

SA Troy Amundson

Printed name and title

Dec 10, 2018

Sworn to via telephone after
submission by reliable electronic
means. Crim. Rules. 4.1; 41(d)(3)



James R. Knepp, II
United States Magistrate Judge

3:18mj5413

**AFFIDAVIT IN SUPPORT OF
COMPLAINT AND ARREST WARRANT**

1. I, J. Troy Amundson, being first duly sworn, hereby depose and state as follows:

2. I am a Special Agent of the Federal Bureau of Investigation (FBI) and have been since January 2008. Prior to employment with the FBI and on an ongoing basis, I have been an officer in the United States Army for approximately 23 years, and currently hold the rank of Lieutenant Colonel in the Army National Guard. As an FBI Special Agent, I am currently assigned to the FBI Cleveland Division, Toledo Resident Agency. As a Special Agent with the FBI, I am an investigative or law-enforcement officer of the United States within the meaning of Rule 41(a)(2)(C) of the Federal Rules of Criminal Procedure. I am engaged in the enforcement of criminal laws and am within a category of officers authorized by the Attorney General to request and execute search warrants pursuant to Title 18, United States Code, Section 3052 and 3107; and Department of Justice (DOJ) regulations set forth at Title 28, Code of Federal Regulations, Sections 0.85 and 60.2(a).

3. I have investigated national-security cases involving individuals seeking to travel overseas to commit violent jihad and who have participated in terrorist fundraising. Additionally, I have completed FBI administered counterterrorism classroom and online training, at the FBI Academy, and at other FBI facilities.

4. The facts in this affidavit come from my personal observations, interviews, my training and experience, and other governmental agencies, and information obtained from other agents and witnesses. This affidavit is intended to show that there is sufficient probable cause in support of the Complaint and the requested arrest warrant and does not set forth all of my

knowledge about this matter.

5. I submit this affidavit in support of a criminal complaint charging DAMON MICHAEL JOSEPH dob xx/xx/1997, with a violation of Title 18, United States Code, Section 2339B, that is, Attempting to Provide Material Support or Resources to a Foreign Terrorist Organization.

BACKGROUND AND PROBABLE CAUSE

6. Title 18, United States Code, Section 2339B prohibits, in pertinent part, a person from knowingly providing “material support or resources to a foreign terrorist organization,” or attempting or conspiring to do the same. “[T]he term ‘material support or resources’ means any property, tangible or intangible, or service, including currency or monetary instruments or financial securities, financial services, lodging, training, expert advice or assistance, safehouses, false documentation or identification, communications equipment, facilities, weapons, lethal substances, explosives, personnel (1 or more individuals who may be or include oneself), and transportation, except medicine or religious materials.” 18 U.S.C. § 2339A(b)(1). “No person may be prosecuted under this section in connection with the term personnel unless that person has knowingly provided, attempted to provide, or conspired to provide, a foreign terrorist organization with 1 or more individuals (who may be or include himself) to work under that terrorist organization’s direction or control or to organize, manage, supervise, or otherwise direct the operation of that organization.” 18 U.S.C. § 2339B(h).

7. On October 15, 2004, the United States Secretary of State designated al-Qaeda in Iraq (AQI), then known as Jam'at al Tawhid wa'al-Jihad, as a Foreign Terrorist Organization (FTO) under Section 219 of the Immigration and Nationality Act and as a Specially Designated Global Terrorist entity under section 1(b) of Executive Order 13224.

8. On or about May 15, 2014, the Secretary of State amended the designation of AQI as an FTO under Section 219 of the Immigration and Nationality Act and as a Specially Designated Global Terrorist entity under section 1(b) of Executive Order 13224 to add the alias Islamic State of Iraq and the Levant (ISIL) as its primary name. The Secretary of State also added the following aliases to the FTO listing: The Islamic State of Iraq and al-Sham (“ISIS” – which is how the FTO will be referenced herein), The Islamic State of Iraq and Syria, ad-Dawla al-Islamiyya fi al-Iraq wa-sh-Sham, Daesh, Dawla al Islamiya, and Al-Furquan Establishment for Media Production. On September 21, 2015, the Secretary added the following aliases to the FTO listing: Islamic State, ISIL, and ISIS. To date, ISIS remains a designated FTO.

9. Beginning in 2014, using social media, ISIS has called for attacks against citizens—civilian and military—of the countries participating in the United States-led coalition against ISIS. For instance, on September 21, 2014, ISIS released a speech of Abu Muhammed Al-Adnani, a senior leader and official spokesman of ISIS, prior to his death. In this speech, entitled, “Indeed Your Lord is Ever Watchful,” Al-Adnani called on Muslims who support ISIS from around the world to “defend the Islamic State” and to “rise and defend your state from your place where you may be.”

10. In approximately May of 2018, JOSEPH’s online social media activities came to the attention of the FBI.

11. On or about September 12, 2018, FBI undercover employee 1 (UC -1) observed numerous photographs DAMON JOSEPH had displayed of knives and firearms on one of his social media accounts.¹ Among the posts, JOSEPH displayed a photograph which was

¹ Your Affiant reviewed the photographs displayed on JOSEPH’s social media account on September 12, 2018, referred to here. While the photograph of firearms appear to be stock

originally distributed by Al-Furqan Media, the media wing of ISIS. JOSEPH also displayed what appeared to be JOSEPH's finger with a ring. The ring displayed words which translate to "Allah, messenger, Muhammad," which are also found on the ISIS flag. In two photographs JOSEPH apparently took of himself, JOSEPH displayed the hand gesture for "tawheed."² In another photograph, JOSEPH appeared to wear the uniform of a security guard with private security firm.

12. On September 12, 2018, UC-1 sent a private message to JOSEPH through one of JOSEPH's social media accounts and inquired as to whether JOSEPH was a revert. JOSEPH replied in the affirmative. UC-1 asked whether JOSEPH was on the "haqq,"³ mentioning having seen a post of JOSEPH's mentioning "Sheikh Anwar" (Anwar Al-Awlaki)⁴. JOSEPH replied that he was, and was looking for a brother to guide him. UC-1 asked JOSEPH whether he was a "khilafah"⁵ supporter. JOSEPH replied that he supported "the khalifa 100%." UC-1 asked JOSEPH if he was a man of talk or action. JOSEPH responded, "It seems a lot of brothers and sisters don't even believe in sharia⁶ There are too many men of talk." JOSEPH asked UC-1 if

photographs, most of the photographs of knives appear to have been taken by JOSEPH.

² "Tawheed" refers to monotheism in Islam, or Oneness of Allah, and describes Him as being One and Unique with no partners or peers. The hand gesture displaying "tawheed" by JOSEPH is commonly used by ISIS to affirm the Oneness of Allah.

³ "Haqq" is the Arabic word for truth.

⁴ Anwar Al-Awlaki was a Yemeni-American Muslim cleric that was influential in radical Islamic circles for his teachings. Al-Awlaki is known to have pioneered the use of social media and digital jihad in the promotion of the cause of radical Islam. Al-Awlaki authored "44 Ways to Support Jihad," which is often cited as a reference by radical Islamic proponents. Way number 29 is "www.Jihad."

⁵ "Khilafah" (or Caliphate) is a general leadership over all Muslims in the world. Its responsibility is to implement the laws of the Islamic system and convey the Islamic message to the rest of the world. In June 2014, ISIS emir Abu Bakr Al-Baghdadi proclaimed the creation of the Caliphate (Khilafah). Thus, "Khilafah supporter" refers to one who supports ISIS.

⁶ "Sharia" is Islamic canonical law based on the teachings of the Quran, the Hadith, and the Sunna, prescribing both religious and secular duties and sometimes retributive penalties for lawbreaking.

he/she was a member of “any groups” where “you all communicate,” meaning an alternate social media application. JOSEPH indicated he used two other social media applications. JOSEPH sent his contact information to UC-1 for one of his alternate social media applications.

13. On September 12, 2018, UC-1 spoke with JOSEPH on a different social media application than the one referenced in paragraph 12, herein. UC-1 questioned JOSEPH as which “khilafah” he was supporting, as there are movements that support the non-violent implementation of an Islamic caliphate. JOSEPH stated, “I don’t believe in the sugar coated watered down Islam alot of Muslims of the west follow.” UC-1 replied, “so when i asked if you supported the khilafah i was speaking of dawlah, commonly known in the west as ISIS.”

14. Beginning September 12, 2018, JOSEPH and UC-1 continued their on-line conversations on an alternate social media application. JOSEPH claimed to have watched a number of videos on YouTube, and stated that he wished he "could access sheikh awlakis videos." JOSEPH stated that he did not support the killings of Muslims or innocent people, but that he did "believe in destroying the enemies of Islam of course," and that he "believ[ed] in jihad as well, but jihad means many things." JOSEPH said he didn't "want to be a coward but at the same time I am not sure what I could do [...] But seeing how our brothers and sisters are treated makes me more and more convinced everyday."

15. As part of the on-line conversations on September 14, 2018, JOSEPH sent a screenshot of his computer's desktop to UC-1. The picture appeared to depict a number of mujahedeen,⁷ two of which were prominently carrying an ISIS flag. A golden-topped mosque is in the background, while a large plane flies overhead. During the conversations, JOSEPH often

⁷ “Mujahedeen” (or singular Mujahid) is one who fights Jihad.

expressed interest in being put in contact with other like-minded "brothers."

16. On September 17, 2018, JOSEPH and UC-1 continued their on-line conversation. JOSEPH told UC-1, "Our job is to spread the true Islam by whatever means necessary" and "The west will never eliminate dawlah⁸ no matter what the media tells people because you cannot destroy an ideology [...]." Later, UC-1 mentioned JOSEPH's Facebook account in which JOSEPH stated, "Inshallah⁹ one day I will be able to move out of this kafr¹⁰ country." JOSEPH stated he thought about leaving all of the time, and was thinking of moving to somewhere in Europe or Lebanon. JOSEPH said he spoke to a "couple of people who were in Syria," and "It would be impossible to travel to turkey from America without being extremely questioned and investigated." At one point, JOSEPH asked if the brothers UC-1 had mentioned in a previous on-line communication were all in the US, and whether "they are on the same page as us then." UC-1 also asked if JOSEPH had ever thought about doing "graphic design for the brothers," to which JOSEPH replied "That would be cool."

17. On September 18, 2018, JOSEPH initiated contact with UC-1. During the online conversation, JOSEPH asked, "Also I forgot to ask what exactly did you mean by some of the brothers might be interested in me like doing stuff with my computer?" UC-1 told JOSEPH "graphic design" was big with the brothers, and "helps attract new recruits, show the world the successes of dawlah." JOSEPH stated he knew how to do some things with Photoshop, after which UC-1 offered to pass along "some of [his] stuff to one of the brothers to check out. No pressure either way." JOSEPH replied, "Lol doing stuff for my brother's would give me

⁸ "Dawlah" is Islamic State (IS), also known as the Islamic State of Iraq and the Levant (ISIL), the Islamic State of Iraq and al-Sham, and the Islamic State of Iraq and Syria (ISIS).

⁹ "Inshallah" (In shaa' Allah) is Arabic for "God willing."

¹⁰ "Kafr" is an Arabic term for disbelief or suppressing the truth of Islam.

something exciting to do though." UC-1 clarified that the work would be for "Dawlah," to which JOSEPH replied, "Ya I know it would be for dawlah." UC-1 told JOSEPH, "They [referencing the brothers] won't put any pressure on you-they only want brothers who are committed and volunteer to help." JOSEPH stated, "For sure Ahk.¹¹ You know I would love to help any way I can." JOSEPH told UC-1 he would work on something for UC-1 to show him/her "the skills I do got lol."

18. On September 19, 2018, JOSEPH initiated online contact with UC-1. JOSEPH and UC-1 discussed a video JOSEPH was working on with a "nasheed"¹² in the background. JOSEPH told UC-1 that it had "Dawlah images." JOSEPH sent UC-1 a video which was approximately 2 minutes and 17 seconds long. The video included images of ISIS fighters and flags, a photo of Abu Bakr al Baghdadi, the leader of ISIS, as well as statements such as "Join your brothers in Islam! Preform [sic] jihad any way you can! We must establish and spread the Khilafa," and "We will fight you in the East and the West the true religion of God will dominate the world!" When asked, JOSEPH stated he had authored all of the text for the video. JOSEPH then asked UC-1, "Will you show it to the other brothers?"

19. On the same date, JOSEPH sent UC-1 a second video which was approximately 2 minutes and 45 seconds long via the alternate social media application. The video included a number of images of Anwar Al-Awlaki, the ISIS flag, and statements such as "Educate yourselves on the teachings of Sheikh Awlaki [...]," "Brothers in Islam we must rise up and fight for our Lord [...]," and "Brothers and sisters! It is our duty as Muslims to establish and

¹¹ "Ahk" refers to Akhi, which means brother in Arabic.

¹² A "Nasheed" is a "chant" or works of vocal music either sung a cappella or accompanied by percussion instruments. Nasheeds are popular throughout the Islamic world. Often such nasheeds are used in ISIS propaganda videos.

spread the Caliphate of Allah azawajal¹³ on this Earth [...]." JOSEPH asked UC-1, "Is that good propaganda?" and "I do have some talent don't I? lol [...]." UC-1 asked if JOSEPH would be ok with "dawlah" using the video. Joseph asked, "How would they exactly," and stated that he (JOSEPH) wanted to meet and talk with the brothers before sending that particular video to them. Later in the conversation, JOSEPH said, "Go ahead and send him what I sent you and tell me if he says anything."¹⁴

20. On September 20, 2018, JOSEPH initiated an online conversation with UC-1, and was later invited into a joint online conversation which included Undercover Employee 2 (UC-2). UC-2 told JOSEPH that UC-1 had forwarded JOSEPH's videos and UC-2 was impressed. JOSEPH said he made the videos the day prior.¹⁵ Later in the conversation, JOSEPH explained that he supported "the khilafa [sic] because as a Muslim we must establish Allah's kingdom on Earth." UC-2 asked JOSEPH what he would say to those that said the best way to establish the khilafah is by co-existing in peace with the mushrikeen,¹⁶ to which JOSEPH replied that "I don't believe in Co existing [sic] with kufr unless you have no choice." UC-2 asked under what conditions JOSEPH would have no choice, and JOSEPH stated, "Like my situation I am surrounded by kufr because I can't move anywhere. I am stuck where I am until I can get enough money saved up to move somewhere better." JOSEPH further explained he "absolutely hate[s] living in America more and more everyday that passes." JOSEPH stated that

¹³ "Azawajl" (or Azawajal) is commonly said after "Allah." It means Allah is Mighty and Dominant and Possessor of Complete Glory and Majesty.

¹⁴ JOSEPH was referring to UC-1 sending JOSEPH's video to UC-2 who JOSEPH believed to be in contact with Al-Hayaat, the media production wing of ISIS.

¹⁵ The day prior to this conversation would have been September 19, 2018. JOSEPH was suggesting he made the videos the same day they were delivered.

¹⁶ "Mushrikeen" (or singular Mushrik) often refers to those who are sinners by practicing idolatry, polytheism, or worship anyone or anything besides Allah.

he thought about making hijrah,¹⁷ but it was not possible for him at the time. JOSEPH advocated doing "any jihad we can," and that his was more of a "virtual jihad."

21. Later on the same date of September 20, 2018, while still in a private conversation between JOSEPH and UC-1, JOSEPH sent UC-1 a third video that was approximately 4 minutes and 50 seconds long which JOSEPH represented to UC-1 that he created. The video contained multiple images of the ISIS flag, images and quotes from Anwar Al-Awlaki, and statements such as "44 ways of jihad, have you contributed? Do your part to help your brothers," "Whatever country you are in, gather with eachother [sic] and do what you can, Allah will reward you for any 44 ways of jihad you can do," "Nothing is greater than what Allah azawajl wills dying a maryter [sic] is most honorable," "will you sit back while our people are being oppressed or will you be a man of action," and "Allah bless and reward the brothers who have made hijrah, Allah also bless those who plan to make hijrah and all those who are upon the same aqueedah."¹⁸

22. On September 21, 2018, JOSEPH initiated an online conversation with UC-1. During the conversation, UC-1 asked JOSEPH's opinion regarding Saudi Arabia and its recent rapprochement with Israel. JOSEPH said that he was not a big fan of the Saudis, and "Anybody responsible for the killing of our people is my enemy." While discussing the ability of making hijrah, JOSEPH stated, "I would as well. Nothing is here for me except a couple family I love." Later, JOSEPH stated, "I would try to go to another country and then try to make my way into Syria Maybe." JOSEPH discussed a documentary he watched regarding Dawlah in the

¹⁷ "Hijrah" means migration (travel), departure or exodus. In this context, it refers to a journey to a land controlled by Muslims.

¹⁸ "Aqueedah" is an Islamic term meaning "creed."

Philippines. After a brief discussion, JOSEPH stated that "Inshallah or [sic] numbers will increase and we will have Daesh¹⁹ all over the world." UC-1 commented that it would not come without a fight, especially in the U.S. JOSEPH replied, "Then so be it if that's the way they want it then that's how they will get it inshallah. You can only fight evil with Force."

23. Later on the same date of September 21, 2018, JOSEPH referenced another video that he was making, stating, "Im excited to hear what the brothers on the front lines think of them." UC-1 asked JOSEPH whether he would consider picking up arms for Dawlah. JOSEPH replied he did not have weapons.²⁰ UC-1 told JOSEPH the brothers sometimes ask that question, and JOSEPH asked, "About waging jihad in the west?" UC-1 provided an affirmative response. JOSEPH replied, "I question myself if I could do it or not everyday [...] As long as we're doing something brother it's better than doing nothing."

24. On September 23, 2018, JOSEPH initiated an online conversation with UC-1. JOSEPH stated he had to link "2 profiles to my phone because my other phone doesn't want to record video anymore."²¹ After a brief online conversation, JOSEPH delivered a fourth video to UC-1 which was approximately 5 minutes and 56 seconds long. The video included numerous ISIS flags, ISIS fighters, images of Anwar Al-Awlaki, and messages such as "Nothing is greater than what Allah azawajal wills dying a martyr is most honorable," "Will you sit back while our

¹⁹ "Daesh" is the Arabic language acronym for the Islamic State (IS), also known as the Islamic State of Iraq and the Levant (ISIL), the Islamic State of Iraq and al-Sham, and the Islamic State of Iraq and Syria (ISIS).

²⁰ Your Affiant understands JOSEPH meant firearms in this conversation when he referred to "weapons." In a later online conversation, discussed in paragraph 27, your Affiant understands JOSEPH then had a different meaning when he mentioned a "weapon" by referring to a specific knife.

²¹ UC-1 understood JOSEPH to be referring to a second social media account, other than the one UC-1 was currently communicating with JOSEPH on.

people are being oppressed or will you be a man of action," "they will never break our spirit and we will show the enemy no mercy," and "If you are a Muslim upon the haqq in the West, don't associate yourselves with the kafr! Support your brothers abroad fighting the evil doers."

JOSEPH was asked if he came up with the words used in the video and JOSEPH replied, "Im trying to make them to inspire brothers fighting and also trying to aim them to recruit [...] Ya I came up with everything." When JOSEPH was asked about his inclusion of the themes of hijrah and martyrdom into his fourth video, JOSEPH stated, "And yes i wanted to add those things into this one."

25. During the online conversation on September 23, 2018, UC-1 asked if JOSEPH's family had access to his computer. JOSEPH replied, "No they dont it is heavily protected lol." When discussing the week ahead, JOSEPH stated he was "going to make more videos for sure." JOSEPH also stated, "the masjid²² i usually go to is anti dawlah so i dont like going to it too often especially not for the lectures just go to pray when i can go."

26. On September 24, 2018, JOSEPH initiated an online conversation with UC-1. JOSEPH discussed a documentary he watched called "Path of Blood," which included home footage of Al Qaeda sleeper cells conducting suicide missions in Saudi Arabia. UC-1 asked if the documentary included the martyrdom videos. JOSEPH responded by praising the video and said, "Ya like the whole thing was like al queda [sic] recording their own missions it was awsome [sic] and the real deal." UC-1 asked if JOSEPH was referring to this when he mentioned he wanted his videos to be used for recruiting. JOSEPH replied, "Ya like i want my videos to inspire brothers in the west too [...] More twords [sic] dawlah but really anyone on the

²² "Masjid" is the Arabic word for Mosque.

haqq."

27. During the same conversation on September 24, 2018, UC-1 asked JOSEPH what his thoughts were on attacks in the US. JOSEPH replied, "I think there are some innocents but essentially all kufr are the enemy which is why im torn." After being questioned as to what he viewed as legitimate targets, JOSEPH replied, "People who are openly against islam for one thing, all military obviously, people who disrespect the prophet and Allah. Like the Charlie Hebdo thing i supported that 100%." Later, JOSEPH said he struggled with the idea of killing, and "(ISIS) definitley [sic] need[s] fighters but there are other important aspects that play a huge role." UC-1 commented they (ISIS) especially need brothers in the west. JOSEPH replied, "Exactly thats my aim to inspire and encourage brothers in the west." JOSEPH continued, "Inshallah my efforts help the cause even if i end up getting in trouble for it." When asked about the risk of jail time, JOSEPH replied, "If thats what end up happening then so be it i only fear Allah at the end of the day. jail isnt going to change me or my religion." When asked about his beliefs regarding attacks on law enforcement, JOSEPH replied, "I've never liked the police LOL." When asked why JOSEPH thought there were more attacks in Europe rather than the US, JOSEPH replied, "I know there hasnt been an attack here lately ive been waiting." JOSEPH further stated, "Its not safe to be muslim in the us either that's why i make sure i carry a weapon at all times." JOSEPH told UC-1 that he usually carries an "italian dagger stiletto," and subsequently sent a photograph of the same to UC-1.

28. On September 25, 2018, a joint online conversation between UC-1, UC-2, and JOSEPH, as well as a private conversation between just UC-1 and JOSEPH took place simultaneously on the alternate social media application. In the joint chat, UC-2 told JOSEPH

that he/she spoke with brothers from Al-Hayaat,²³ and that they were impressed with JOSEPH's potential. In the private chat, when JOSEPH learned Al-Hayaat is the media production wing of ISIS, JOSEPH replied, "oh even better." In the joint online conversation, JOSEPH sent a series of three PowerPoint slide shows to UC-1 and UC-2. These "videos" were different from the videos JOSEPH previously delivered as they came directly from JOSEPH's computer and were not simply a recording of JOSEPH's computer screen by his phone.

29. In the joint online chat, UC-2 told JOSEPH before the brothers in Al-Hayaat would use any of JOSEPH's material, they needed to know that JOSEPH was on the "haqq" and would have to pledge "bay'ah"²⁴ to prove his sincerity. In the private online conversation, UC-1 told JOSEPH not to feel pressured as "[...] Dawlah only takes those that volunteer. [...]" and "[...] but you have to make that choice yourself. it is a personal decision." In the joint online conversation, UC-2 sent JOSEPH a script he could read. Soon after, JOSEPH sent a video to UC-1 and UC-2 in the joint conversation. In the video, JOSEPH displayed the hand gesture for "tawheed"²⁵ and read the script while he pledged bay'ah to Abu Bakr al Baghdadi, the leader of ISIS. In the private conversation, in regard to the video JOSEPH had just made and sent to UC-1 and UC-2, JOSEPH told UC-1 he was "filled with emotion" and "It's almost the same feeling that overcame me when I accepted Islam first."

30. On September 26, 2018, JOSEPH initiated an online conversation with UC-1. After a short discussion, JOSEPH mentioned another video he was creating. He said the new video would focus "on jihad in the west inshallah." He further stated, "It's been too quiet and

²³ "Al-Hayaat" (or Al-Hayat) as explained to JOSEPH, is the media wing of ISIS.

²⁴ "Bay'ah in Islamic terminology is an oath of allegiance to a leader.

²⁵ As noted previously, "tawheed" is a hand gesture often associated with support for ISIS.

something new needs to be done especially in the US [...] My target audience for this one will mainly be Muslims upon the haqq in America and the UK." JOSEPH later stated he watched "some dawlah media productions on Al hayaat last night," and was impressed with how well they were made. After additional conversation, JOSEPH stated, "Inshallah one day i can do more than makes videos." JOSEPH was asked what he had in mind and JOSEPH replied, "waging more physical jihad." However, JOSEPH stated for now he would stick with what he was good at until the "time comes to do more." After a discussion about UC-1's work for Dawlah, JOSEPH stated, "You are doing a good thing and yes I agree essentially it's everyone's personal choice at the end of the day." JOSEPH and UC-1 continued to speak about other ways to help Dawlah, and that JOSEPH should not feel pressured. JOSEPH stated, "No i dont its all voluntary. Its all my choice." At one point, JOSEPH asked, "will i be meeting more brothers though on (the alternate social media application)? I wish i could meet with dawlah brothers in person." He then stated, "Hopefully one day inshallah i will be a trusted known member of our group."

31. On September 27, 2018, JOSEPH initiated an online conversation with UC-1. JOSEPH said he had been sick but was working on a new video, and "hope[ed] this shows how dedicated i am lol." During this conversation, JOSEPH delivered his most recent video production, and four videos in .mp4 format he had previously delivered by capturing video of his computer screen with his phone.

32. On September 27, 2018, UC-1 told JOSEPH he would soon be sent footage of a "brother who will make the ultimate sacrifice for Dawlah." JOSEPH asked whether it would occur "in the west" and UC-1 confirmed it would. UC-1 asked JOSEPH whether he would be willing to edit the footage to help inspire those in the US, and JOSEPH replied, "i can try my

best inshallah. it shouldnt be a problem ahk." UC-1 clarified specifically what the video would involve stating, "I want to make sure you understand what im talking about tho--this is a Dawlah brother's martyrdom video, for an attack that will occur here in the US. are you comfortable with that?" JOSEPH replied, "I am [...] Allahu Akbar!!! [...] Inshallah I will make it beautiful." JOSEPH asked if it would be on the news and UC-1 told him that if the attack were successful, it would be. UC-1 again clarified by asking if JOSEPH was "comfortable doing this at the behest of our ISIS brothers." JOSEPH replied, "Yes no worries."

33. On September 28, 2018, JOSEPH initiated an online conversation with UC-1. After discussing JOSEPH's value in video editing, JOSEPH was asked about his comment on September 26, 2018, regarding "physical jihad." UC-1 asked JOSEPH what he was envisioning with respect to physical jihad. JOSEPH initially replied he really did not know right now. Later, JOSEPH explained, "I don't think I'm the one for that at least not at this point in my life." UC-1 replied, "that is just fine brother." JOSEPH said, "Maybe one day I could even be a recruiter I've always been told I have strong leadership skills and can convince people of things."

34. On September 29, 2018, JOSEPH initiated an online conversation with UC-1. During the conversation, UC-1 told JOSEPH that a "Dawlah brother"²⁶ would potentially be traveling through Ohio in the next few weeks. After a brief conversation, JOSEPH said that he "would be totally interested" in meeting a Dawlah brother. JOSEPH stated he used to work as a security guard, but could not be armed as he was too young. However, he stated that as a security guard, he had previously had both handcuffs and pepper spray, and had used the

²⁶ This "Dawlah brother" was later portrayed by a FBI employee operating in an undercover capacity (UC-3) on October 24, 2018.

handcuffs.²⁷ JOSEPH stated he could no longer work as security due to having a “violent charge” which also prevented him from “purchasing and possessing a firearm or ammo legally.” JOSEPH said that he had always been into guns, and he used to hunt with his family when he was a kid. With respect to risking jail time to support Dawlah, JOSEPH stated, “Yeah what I mean is it doesn’t scare me and if that’s what ends up happening then so be it I know God has a plan for me [...] Jails and prisons are actually good places for recruitment.”²⁸ UC-1 asked, “For dawlah?” JOSEPH replied, “Yeah theres a lot of good Brothers in there.” At one point during this conversation, JOSEPH was asked if he felt hate for the people in the US. JOSEPH replied, “Oh yeah definitely [...] The gays the Christians the Catholics the Jews you name it.”

35. On October 1, 2018, JOSEPH initiated an online conversation with UC-1. During the conversation, JOSEPH asked UC-1 "about the brother that's going to do the mission or the video."²⁹ JOSEPH then asked whether "the brother driving through Ohio" would be the one that would "carry it out," referring to "the mission." UC-1 understood JOSEPH to mean the martyrdom mission for which JOSEPH was going to edit the martyrdom video. JOSEPH told UC-1, "I just want to do my best with that video" and that "I'm just looking forward to the whole thing really." UC-1 asked JOSEPH whether he was referring to the video or the brother coming to visit. JOSEPH replied, "The video. the operation and the brother."

36. On October 8, 2018, JOSEPH initiated an online conversation with UC-1. After a brief conversation, JOSEPH expressed concern to UC-1 about the video footage he was

²⁷ It is unknown whether JOSEPH still possesses these items.

²⁸ In a similar vein, JOSEPH told UC-1 on September 14, 2018, that he was pursuing a degree to become a counselor in the prison system so that he could use the opportunity to spread “dawah.” “Dawah” refers to the practice of inviting non-Muslims to better understand Islam.

²⁹ JOSEPH is referring to the video footage JOSEPH was asked to potentially edit in paragraph 32 and the “Dawlah brother” mentioned in paragraph 34. JOSEPH was never provided this video.

supposed to edit but had yet to receive, and about the “brother coming to Ohio.” JOSEPH said he felt like he had been “kept in the dark about everything.” JOSEPH also stated he hoped “people aren’t questioning my loyalty.” JOSEPH was assured that his loyalty was not being questioned.

37. On October 12, 2018, JOSEPH initiated an online conversation with UC-1. JOSEPH informed UC-1 that one of his social media accounts was shut down. JOSEPH stated the shutdown was due to a photograph he put onto his page. JOSEPH sent the photograph that he believed caused the shutdown to UC-1. The photograph depicted a snarling lion, and the quote, “And fight them until there is not fitnah³⁰ and [until] the religion, all of it, is for Allah.” [Quran 8:39]. The bottom right corner of the photograph included a circle emblazoned with Arabic words which translated to “Allah, messenger, Mohammad.” In your Affiant’s training and experience, this is the same circle used on the ISIS flag, though the words themselves are not exclusive in their use by ISIS.

38. On October 14, 2018, JOSEPH initiated an online conversation by sending UC-1 a video which was intended to be an ISIS inspirational video which JOSEPH represented was produced by him. The video made statements such as, “would you die for your religion and your lord” and “blood has to be spilled for progress to be made. Referring to the video, JOSEPH said he “tried] to inspire brothers in the west mainly but i like to give credit to the brothers already fighting of course.” During the ensuing conversation, UC-1 asked JOSEPH where he saw himself fitting, stating, “Dawlah always wants to know where each individual

³⁰ “Fitnah” is an Arabic word that depicts civil strife and turmoil. It has connotations of trial, affliction, or distress. It is considered a highly negative and destructive internal conflict that plagued Muslims decades after the prophet’s death. The Qur’an states “Fitnah is worse than death.”

brother and sister is to best fit in with operations." JOSEPH initially said he was not sure where he would fit in, but then stated, "Your talking about for an operation? The only thing i could see is like a coordinated shooting but i still dont see how that would happen." After a brief conversation, JOSEPH stated, "Inshallah thats what i would have interest in (referring specifically to physical jihad) but my virtual jihad is my focus at this point. Plus how would i even go about it?"

39. During the same online conversation, JOSEPH sent UC-1 the photograph JOSEPH believed caused his profile page to be removed from a social media application. During the conversation, JOSEPH revealed he was communicating with another "brother" and JOSEPH had "him on the hook for lack of a better term lol [...]" UC-1 asked JOSEPH if he saw "recruiting others to Dawlah as part of your digital jihad," and JOSEPH replied "I do yes i think i could be good at it." During the ensuing conversation, JOSEPH revealed he discovered the "brother" on a social media application. JOSEPH described his technique for spotting possible recruits through this social media application. He stated, "I look at the kind of things they post, then i see if they are in tge [sic] west, then i engage in conversation where i deliberately ask certain questions that hint at dawlah, then evaluate their answer." During the conversation, JOSEPH debated sending his videos to the "brother," but decided that "it will basically say im apart [sic] of dawlah [and that it] could scare him off. Maybe too upfront."

40. On October 19, 2018, UC-1 and JOSEPH had an online communication wherein JOSEPH expressed his pleasure at being a part of "dawlah" and indicated his willingness to help in an "operation," whether big or small, stating, "Inshaallah one day i will be involved directly in one," and "I do still see myself someday in physical jihad for sure." Joseph also

divulged during this communication that he was “talking to a couple of dawlah brothers back in 2016 for a short period of time,” and that they were part of his decision to convert to Islam.

41. On October 21, 2018, during an online conversation between UC-1 and JOSEPH, JOSEPH expressed his support for “martyrdom operations.” In regard to these types of operations, JOSEPH stated, “what must be done, must be done,” “the kufr are the kufr,” and “there are always casualties of war.”

42. On October 30, 2018, UC-1 and JOSEPH had communications online regarding the mass shooting of a Jewish synagogue in Pittsburgh, Pennsylvania. JOSEPH told UC-1, “The kufr doing our work for us haha.” JOSEPH continued, “I know in the Quran it says do not attack a place of worship . . . My opinion is the Jews are evil and they get what's coming to them. I don't feel bad at all considering what they're doing in Palestine. They're the same as the shia in my eyes. All dogs.” UC-1 asked JOSEPH, “and what is your opinion on attacks on places of worship?” JOSEPH further stated, “My opponion [sic] is i know we wouldnt like our mosques attacked. so im on the fence. They are disbelievers all the same though. So i dont feel bad.” JOSEPH continued, “Jews are jews none are innocent. They support israel, then theyre enemies in my book.” UC-1 asked JOSEPH whether there were a lot of Jews where he lived. JOSEPH replied, “Theres like two synagogues I know of but I don't know any Jews . . . I absolutely despise Jews always have even before being Muslim.” With respect to the Pittsburgh shooter, JOSEPH stated, “I admire what the guy did with the shooting actually.” JOSEPH confided in UC-1 that, “I can see myself carrying out this type of operation inshallah. They wouldnt even expect it in my area . . . Im fantasizing but i seriously could see myself doing something similar to that . . . Im not going to do anything. Im speculating . . . But its a future possibility nonetheless. . . Still how would i go about carrying out an operation like a

shooting? Especially a solo mission. In shaa allah i would have help. . . But im speaking futuristically inshallah. Thats what my physical jihad would be. Something along those lines. But obviously that would be the last thing i do. Im perfectly fine with what i do as of now in terms of virtual jihad.” JOSEPH continued, stating, “For srarters [sic], we would pick a synagogue or place jews gather, scope it out, find all exits and entrances, times people will be there, police presence of the area, i have a police scanner so i would be able to hear when they would be responding, we would coordinate it by splitting up to ensure the most casualties possible. Then escape in a vehicle before police arrive. And if they got there fast, then fight it out and whatever happens may Allah swt grant us victory and Jannah if it comes to that. I am no coward. I wouldnt want to die any other way except a martyr inshallah. Alhamdulilah. Thats just my thoughts as of now.” JOSEPH concluded by telling UC-1, that he knew of a good synagogue for a shooting, and that “it would take a lot more planning than this of course. Especially if another brother got involved. In shaa allah.” During this conversation, after JOSEPH discussed a shooting targeting Jews, UC-1 expressed to JOSEPH, “now that you have pledged ba’yah, it’s of utmost importance that you take no action without coordination with me for security reasons. Does that [make] sense?” JOSEPH replied, “Yes of course.”

43. On November 10, 2018, JOSEPH told UC-1, “And yes I make du’a³¹ everyday that I will be able to do physical jihad someday in shaa allah because I told UC-3³² that’s the greatest jihad.” UC-1 told JOSEPH that physical jihad “can be a dark path – jail or death awaits at the end of it potentially.” JOSEPH replied, “Yes, alhamdulilah I have come to realize this and im leaving it in the hands of Allah azzawajaal. And it does take a lot of thought and

³¹ Du’a refers to prayer.

³² Joseph did not use the word “UC-3,” but rather the name of the undercover persona.

decision of course . . . But I know i have it within myself to take part in physical jihad.”

JOSEPH continued, “My intentions are to never stop virtual jihad because I know it serves a good purpose and theres always progress to be made in that field. And that physical jihad is the path I will eventually take . . . im always having ideas and thoughts about both jihads.” UC-1 told JOSEPH, “that brothers do not normally supply a plan as they do not wish to coerce or force good brothers (Dawlah brothers) into a decision they are not ready for.” UC-1 asked JOSEPH whether UC-1 made JOSEPH ever feel pressured. JOSEPH replied, “No not at all . . . Ive clearly done everything on my own account and time to show dedication and skill.” UC-1 explained to JOSEPH that JOSEPH’s plan would need to go through the approval process. UC-1 stated, “It is important not to do anything without dawlah leadership knowing first.”

44. On November 18, 2018, JOSEPH discussed with UC-1 that UC-3, whom he was attempting to recruit to ISIS was “coming along very well . . . Focusing on jihad and what it means. He considers me a true brother and his teacher Alhamdulilah. I am grateful for that.” JOSEPH told UC-1 that he was probably going to sell his computer tomorrow because “money is tight.” He continued, “So i wont be able to work on any videos for a while until I buy another.”

45. On November 18, 2018, JOSEPH disclosed to UC-1 that most of his communication is through his phone and that his phone is password protected and in that way he would be able to secret his activities from his future wife.

46. On November 18, 2018, JOSEPH told UC-1 that, “My intent is to figure out what he (UC-3) sees himself doing for dawlah in general. And to figure out if physical jihad would be something he sees himself doing at some point.

47. On November 19, 2018, UC-1 learned that JOSEPH sold the computer he used to make ISIS propaganda videos to a local pawn shop. Your Affiant confirmed the sale of JOSEPH's computer with a local pawn shop and took possession of the same.

48. Also on November 19, 2018, JOSEPH and UC-1 again discussed UC-3's progress. UC-1 asked JOSEPH whether JOSEPH believed that UC-3 supported dawlah. JOSEPH replied, "Without a doubt I just think he doesn't know where he fits in." JOSEPH continued, "I think the next step for him judging how this next meeting goes, is bay'aa."

49. On November 25, 2018, JOSEPH and UC-1 had a conversation wherein JOSEPH told UC-1 that regarding physical jihad, "I know that I'm a brother willing to do it . . . It's just a matter of how when and where . . . But like you said it's not a path for everybody . . . I just feel like I can do more before I ultimately decide to take that path because there's no turning back . . . Some brothers and sisters are too soft-hearted when it comes to the kufr." UC-1 replied, "there are not many brothers willing to do it." JOSEPH continued, "I feel no sympathy and rather it puts a smile on my face seeing the justice that has already been served."

50. On November 25, 2018, UC-1 asked JOSEPH, "what is making you think more and more of physical jihad?" JOSEPH replied, "Well now that I don't have a computer it's been more on my mind . . . And just hearing stuff from the news and seeing how things are every day . . . I just know I got a lot of good ideas in my mind." UC-1 asked, "what are some more of your ideas? In addition to the one you told me before." JOSEPH replied, "Just if you're going to do something do it big. . . Thinking about areas with a good amount of people." UC-1 asked, "Anything else?" JOSEPH responded, "Well I know what I would do would be a shooting of some sort . . . It wouldn't be expected in my area." UC-1 asked, "why not?" JOSEPH replied, " Real quiet calm place. . . Not much happens around here . . . A lot of

churches . . . I would prefer to hit the Jews or the shia.” Later in the same conversation with respect to the materials that he would need for the shooting JOSEPH stated, “A pistol is concealable, but a rifle would be convenient . . . I’m pretty knowledgable on weapons. . So I know how to handle a firearm and fire arm [sic] safety . . And I’ve done a lot of research . .”

51. On November 26, 2018, while conversing online with UC-3, JOSEPH stated, “Dawlah isn’t just an army of Allah swt, but the truest faith and ideology [sic] which will continue to grow and spread. And inspire more and more brothers and sisters in shaa allah.” JOSEPH continued, “America and Russia will fall, as Babylon did. Its prophesied.”

52. On November 26, 2018, JOSEPH had online communications with UC-1, wherein he discussed his efforts to recruit UC-3 to “dawlah.” JOSEPH told UC-1 that UC-3 “is ready for bay’ah.” JOSEPH continued, “After bay’ah. I told him i will reveal more of my plans and ideas. Maybe, inshalla we could come together for something. . I will continue to guide him.” When asked by UC-1 how he felt about bringing a brother to “dawlah,” JOSEPH replied, “I feel honored, blessed, and happy to be able to be in this position. I know what i am doing is good and may Allah be pleased with me.”

53. On November 27, 2018, JOSEPH had communication with UC-2. JOSEPH told UC-2, “Alhamdulilah. I have been working with akhi UC-3 since you referred him to me. He has come a long way in shaa allah.” UC-2 replied, “mashaa’Allah akhi, come a long way as in how exactly?” JOSEPH replied, “In terms of learning from me, and wanting to join dawlah in shaa allah. . We have had the luxury of meeting in person twice now. . I have been doing my best to teach him about jihad, and explaining dawlah too [sic] him. He expressed some concerns in the beginning but i believe his mindset has changed much like mine did. Alhamdulillah. We have a lot of trust and respect between us . . Finally yesterday he expressed

to me he trusts my judgement and is ready to move forward so i told him bay'ah needs to be done first inshallah . . . I told him to reflect upon surah At-Tawbah especially. He is always looking for guidance.”

54. On November 27, 2018, JOSEPH had a conversation with UC-1. JOSEPH told UC-1, “I do know of a website where you can buy firearms locally though.” JOSEPH then provided UC-1 with the link to the website.

55. On November 29, 2018, JOSEPH had an online conversation with UC-3. JOSEPH told UC-3, “They have no idea how many of us there really are globally. And that strikes fear in their hearts. And I intend to cause more in shaa allah.” During this same conversation JOSEPH asked UC-3, “. . . but do you understand the end results of this path in Dar El Kufaar?”³³ UC-3 replied, “I think so akhi. I think there are only a few logical outcomes. What do you think?” JOSEPH replied, “Akhi (UC-1) wanted me to make sure you understood 100% the risks involved with being a Dawlah brother. Mainly in the west.” JOSEPH continued, “There is imprisonment, and there is martyrdom.” JOSEPH continued, “We would be considered shaheeds and martyrs if we died in the cause of Allah SWT. A Shaheed is someone dying protecting what's theirs like property, family, their body, their ummah/religion, etc”

56. On November 29, 2018, JOSEPH and UC-2 had an online conversation. JOSEPH told UC-2 that he wanted to discuss some ideas regarding physical jihad and that eventually JOSEPH would choose an idea and make a plan. UC-2 responded, “No plans are to be acted on now without coordinating first insha'a'Allah. This is vitally important for reason's

³³ JOSEPH's reference to “Dar El Kufaar” is a reference to the land of the disbelievers.

I'm sure you understand my brother." On November 30, 2018, JOSEPH responded, "I understand akhi."

57. On November 30, 2018, JOSEPH had online communication with UC-2. JOSEPH told UC-2, "I know I have progressed only by the permission of Allah subhaanahu wa t'aala. and I have a few things in mind when it comes to physical jihad. I can see myself doing a few things. But i know it will ultimately be an operation consisting of a shooting. And i have a few targets in mind. Some ideas involve myself and some involve other brothers that would be willing and who understand consequences. The only thing is i have no access to the materials that would be neccesarry [sic]. In shaa Allah i will come up with something effective and i will share it with you. Also i will do my best with akhi UC-3 to see if he would willingly involve himself in an operation with me in shaa Allah. He wishes to follow my lead Alhamdulilah. As of now i plan to either wage jihad against the shi'a or the jews." JOSEPH continued, ". . . I have thought about it a lot. And i know its what i need to do. Strike fear in the hearts of the kufaar on their own land. Since i cant make hijrah. In shaa allah. I know my targets would be either shia or jews preferably. But i know all kufr are the enemy of Allah SWT. So I will do some investigating of my area and the things going on. To be able to attack as many as possible. I have to keep security in mind and hit them where theyd least expect it. I do know of one synagogue and one shi'a masjid in my area. JOSEPH continued, "I plan to use the internet for information on possible locations and maybe even events taking place in the near future. And i understand the procedure akhi. Some places i am able to drive by and get a good idea of. Something happening in my area would be unexpected to say the least ." JOSEPH added, "There is a school as well if need be." UC-2 asked, "inshaa'Allah akhi, do you mean the school as a possible target?" JOSEPH replied, "If it needs to be. It's a possibility."

UC-2 replied, “. . . but I have to ask if you are sure you are ready for the bloodshed that might accompany such an operation?” JOSEPH replied, “I have asked myself this alot, and ive come to terms with what must be done. Our brothers and sisters blood is shed everyday. So inshaa’Allah i will deliver justice.” JOSEPH concluded, “I knew i would progress to physical jihad by the will of Allah azzawajaall. I have made a lot of du’aa. And i will have more details as time progresses inshallah. I will give you everything.” UC-2 replied, “You do know there are many ways to perform jihad, physical jihad being only one of these. Many ways to help your brother and honor the Ummah of our beloved Prophet SAW. you will be no less our Muslim brother akhi, if you decide upon a different path. is killing upon the path of Allah really what you want, brother? JOSEPH replied, “Yes i know akhi. But this is something i know I must do. You brothers have been bery [sic] good to me. May Allah SWT be pleased with all the ikhwan³⁴. I knew from the beggining [sic] I would get to this stage. And in shaa Allah i will be succesful [sic] in whatever i choose to do.” During this conversation, UC-2 made clear to JOSEPH that, “This is an operation now so I can’t say it enough – NO actions without coordinating with Dawlah first.” JOSEPH replied, “I completely understand akhi.”

58. On November 30, 2018, JOSEPH had an online conversation with UC-3. JOSEPH told UC-3, “Akhi also remember that I need you to try and decide what path you desire to take with Dawlah and let me know.” JOSEPH continued, “Your decision must be of sound mind and judgement. No brother could coerce or make you do anything you’re not comfortable with.” UC-3 responded, “As for the path I desire to take with Dawlah, Im ready

³⁴ Ikhwan is the Arabic word for brothers.

for anything. I understand there are risks but again i desire to ultimately please Allah and serve our Ummah.”

59. On December 2, 2018, JOSEPH told UC-2, “Im looking to see if he has interest in coming together maybe for a future operation. and I would still need to make a set day and time when i know the most people would be there. Akhi (UC-3) claims he has money and resources available to him that may be of use for an operation. In shaa Allah. JOSEPH then forwarded a document to UC-2 that read:

Abdullah Ali Yusuf's plan. In shaa Allah.³⁵

Materials needed: assault rifle or semi automatic pistol, at least 2 magazines and plenty of ammo.

Jews who support state of israel are desired targets.

1. Arrive at location.
2. Gain entry to building.
3. If a lone attack, start attack where most people are gathered.
4. If the operations consists of 2 or more brothers, split up and enter at different angles of building in order to trap people. And inflict mass casualties. Do best to make sure none escape.
5. Use a vehicle to escape area before police arrive. Preferably a getaway driver. In shaa allah.
6. Lay low.
7. If a fight with police insists [sic] on scene, or when police come after me at home, then so be it.
8. May Allah swt grant us success.
9. Keep weapon in case need to use it against police if necessary.

Joseph then stated, “I dont see this as being a martyrdom operation but only Allah swt knows the future. And thats the draft of the plan so far.” JOSEPH told UC-2 that he would ask UC-3

³⁵JOSEPH chose the kunya Abdullah Ali Yusuf. A kunya is a chosen name.

if “he wants to assist or be directly involved. . . He could just end up being my driver if willing. In shaa allah. It just depends.” JOSEPH continued, “His help or participation could help me a lot. But if hes not willing or if its to early for him or something along this path, then i will have to spend more time coming up with something probably by myself. In shaa Allah.” UC-2 asked JOSEPH if he was “committed to conducting this operation even if you have to go it alone akhi?” JOSEPH stated he was committed to the operation, “without a doubt.”

60. On December 4, 2018, JOSEPH told UC-1 that UC-3 had talked with JOSEPH the last couple of days and told him that he was prepared to assist me “however [sic] way he can.” JOSEPH continued, “I told him i would discuss my ideas and plans in person more. he told me to count him in and that he is open to anything Alhamdulilah. Allah has crossed our paths for this i believe.” When asked, JOSEPH told UC-1 that he no exact timeline in place, “but i know my target . . .The jews who support israel. Theres 2 synagogues in my city. JOSEPH then provided the name of the two synagogues to UC-1. JOSEPH indicated that he would likely choose the larger of the two synagogues as his target. JOSEPH stated that his choice would depend on factors such as, “Which one will have most people, what time and what day. Go big or go home.” During this online conversation with UC-1, JOSEPH provided what appeared to be an internet link and photograph of one of the synagogues. JOSEPH also provided a photograph of magazines for a firearm that he represented to UC-1 was “Vietnam era stuff.” In addition to photographs of the firearm magazines, JOSEPH also forwarded to UC-1 photographs of military manuals that JOSEPH represented had belonged to his grandfather before he passed, but noted, “But its some pretty useful information.” JOSEPH explained, “. . . but yea ive looked through the books and its information on like recon and EOD stuff from the vietnam [sic] time. Some things may come in use.” JOSEPH had explained in

previous communications with UC-1 that he presently lives with his grandmother in the home that his grandfather also used to live in prior to his death.

61. On December 5, 2018, JOSEPH and UC-3 met at a location in Holland, Ohio. Later, at a different location in Toledo, Ohio, JOSEPH discussed conducting a mass shooting at a Jewish synagogue. JOSEPH identified for UC-3 two synagogues that he viewed as targets in the greater Toledo area. JOSEPH discussed with UC-3 the types of weapons that he believed would be able to inflict mass casualties. JOSEPH showed UC-3 photographs of certain firearms on the internet on his cellular telephone. JOSEPH made hand written notes about the firearms he wanted for the terrorist attack on the synagogue for UC-3 on a piece of paper. These notes included reference to “ar15 takes .223 or .556 ammo,” and “2 of the same Glock 17’s or 21’s and ammunition [sic],” and “2 of the same AK 47 or AR 15.” JOSEPH also identified to UC-3 another potential target for a terrorist attack in the Toledo area that was military in nature, but noted that this would tactically be a difficult target. JOSEPH discussed with UC-3 that when they conducted the mass shooting they would need to be cognizant of cross fire. JOSEPH proposed several scenarios to UC-3 as to how they could acquire the firearms for the mass shooting. JOSEPH indicated that he wished to obtain two rifles and two pistols for the shooting and that 30 rounds would not be enough and that he wanted to cause a “massacre.” JOSEPH also told UC-3 that when they conducted the attack they should use pistols to kill people that were not dead in the first round of fire.

62. On December 5, 2018, after his meeting with UC-3, JOSEPH had an online conversation with UC-1. JOSEPH told UC-1, “I filmed his bay’aa. With an actual camcorder. We discussed targets, and weapons. Ideas and plans. Hes 100% on board! Were doing this together inshallah. He has access and money to be able to possibly obtain some materials.”

JOSEPH continued, "It was incredible. And he agrees with whatever i think is best. He knows to contact u (UC-1) and UC-2. Should be tonight. In shaa allah. Were hanging out tomorrow too in shaa Allah." After discussing with UC-1 the type of weapons that would be used in the attack, UC-1 inquired whether JOSEPH had a place to store the weapons. JOSEPH replied, "Got alot of places in my room alone and a whole spare bedroom. Plus a shed she (grandmother) never goes in."

63. On December 6, 2018, JOSEPH and UC-3 met in the Toledo area. JOSEPH gave UC-3 guidance as to how to purchase the AR-15's. Specifically, JOSEPH instructed UC-3 to determine how many rounds had been fired through the gun, examine the charging handles to make sure they worked, check the general condition of the firearm. After doing research on his cell phone in front of UC-3, JOSEPH selected the target for the attack. JOSEPH stated that it would be ideal to attack two synagogues, but probably more realistic to only attack one. JOSEPH stated that he wanted to kill a rabbi. JOSEPH wrote the name and address of where the attack was to occur for UC-3. JOSEPH told UC-3 that he had done research to determine when the Jewish Sabbath was so that more people would be present at the synagogue. JOSEPH stated that he wanted to use a handgun on his victims. JOSEPH gave UC-3 instructions on how to enter the synagogue. JOSEPH pulled up photographs of the inside of the synagogue and told UC-3 that he wanted to begin the attack in the sanctuary. JOSEPH and UC-3 drove to the synagogue where JOSEPH directed UC-3 to drive around the synagogue complex. JOSEPH told UC-3 that he would teach UC-3 how to use the weapons. JOSEPH told UC-3 that he was not going in with a martyrdom mindset, but rather a killing mindset. JOSEPH told UC-3 that he could hide the AR-15's once they were purchased by UC-3. JOSEPH told UC-3 he would hide the AR-15's at his house. JOSEPH told UC-3 that he would work with UC-1 to obtain the

pistols needed for the attack. JOSEPH stated that he would shoot at law enforcement and would not surrender.

64. Late in the day on December 6, 2018, UC-3 represented to JOSEPH that UC-3 purchased the rifles for the attack. UC-3 sent a photograph to JOSEPH that depicted the rifles laying on the floor. JOSEPH and UC-3 began discussions about JOSEPH taking possession of the rifles the following day.

65. On December 7, 2018, JOSEPH and UC-3 had online communications, wherein JOSEPH agreed to take possession of the two rifles that JOSEPH believed UC-3 had purchased for the attack. JOSEPH and UC-3 arranged to meet and exchange the rifles that evening.

66. On December 7, 2018, JOSEPH and UC-3 met at a pre-determined location. JOSEPH approached the car UC-3 was driving. JOSEPH opened the passenger side door of the car and JOSEPH and UC-3 had a brief conversation. JOSEPH grabbed the black duffel bag with two semi-automatic AR-15 type weapons, closed the door and walked a distance away from the car.³⁶ JOSEPH was then arrested by law enforcement officers while in possession of the duffel bag containing the weapons.

67. On December 7, 2018, law enforcement officers provided JOSEPH constitutional warnings pursuant to Miranda. JOSEPH stated he understood those warnings and knowingly and voluntarily waived the same. JOSEPH then provided an oral statement to law enforcement officers, wherein JOSEPH detailed his plans for the attack, and his intent to cause mass casualties in support of ISIS.

³⁶ The weapons provided to JOSEPH were demilled, meaning that they were rendered inoperable by law enforcement officers. Law enforcement officers attempted to test fire these weapons prior to JOSEPH taking possession of them, to ensure that they could not fire. Additionally, JOSEPH was not provided with ammunition for the weapons at the time of their exchange.

68. Based on the foregoing facts and circumstances, there is probable cause to believe that DAMON MICHAEL JOSEPH has committed a violation of Title 18, United States Code, Section 2339B, that is Attempting to Provide Material Support and Resources to a Foreign Terrorist Organization. As such, your Affiant requests that a warrant issue for his arrest.

Respectfully submitted,



J. Troy Amundson
Special Agent
Federal Bureau of Investigation

Dec 10, 2018

Sworn to via telephone after submission by reliable electronic means.
Fed. R. Crim. P. 4.1 and 41(d)(3).



James R. Knepp, II

UNITED STATES MAGISTRATE JUDGE